1	JENNY L. FOLEY, Ph.D., ESQ.		
2	Nevada Bar No. 9017		
3	E-mail: jfoley@hkm.com MARTA D. KURSHUMOVA, ESQ.		
	Nevada Bar No. 14728		
4	E-mail: mkurshumova@hkm.com HKM EMPLOYMENT ATTORNEYS LLP		
5	1785 East Sahara, Suite 300		
6	Las Vegas, Nevada 89104 Tel: (702) 625-3893		
7	Fax: (702) 625-3893		
0	E-mail: jfoley@hkm.com		
8	Attorney for Plaintiffs UNITED STATES	DISTRICT COURT	
9	DISTRICT OF NEVADA		
10			
11	ERIC WATSON, an Individual		
12	Plaintiff,	CASE NO.: 2:19-cv-00783 -RFB-VCF	
13	Tiantin,		
	vs.		
14	BANC OF AMERICA MERCHANT		
15	SERVICES LLC, a Foreign Limited-		
16	Liability Company; DOES I -X; and ROE CORPORATIONS I -X.		
17			
18	Defendants.		
	STIPULATION AND ORDER TO EXT	END THE TIME FOR PLAINTIFF TO	
19	RESPOND TO DEFENDANTS' COUNTERCLAIM AND DEMAND FOR JURY		
20		<u>IAL</u> EQUEST)	
21			
22	COMES NOW, the Plaintiff, ERIC WATSON ("Watson"), by and through his attorney,		
23	JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP,		
24	and Defendant, BANC OF AMERICA MERCHANT SERVICES LLC ("BAMS"), by and		
25	through its attorney, SHAUNA N. CORREIA, ESQ., of WEINTRAUB TOBIN CHEDIAK		
26	COLEMAN GRODIN LAW CORPORATION	I, hereby stipulate and agree as follows:	
27	///		
28			
		4 00	

1	1. That the Response to the De	efendant's Counterclaim and Demand for Jury
2	Trial that is due on July 22, 2019, will now be	due on August 1, 2019.
3	2. This extension of time is ma	ade in good faith and not for purpose of delay.
4		e with respect to the Counterclaim and Demand
5	-	e with respect to the counterclaim and Demand
6	for Jury Trial.	
7		
8	Dated this 16 <sup>th</sup> day of July, 2019.	Dated this 16 <sup>th</sup> day of July, 2019.
9	HKM Employment Attorneys LLP	Weintraub Tobin Chediak Coleman
10		Grodin Law Corporation
11	/s/ Genny L. Foley	/s/ Shauna N. Correia
12	Jenny L. Foley, Ph.D., Esq.	Shauna N. Correia, Esq.
13	Nevada Bar No. 9017 1785 East Sahara Ave., Suite 300	Nevada Bar No. 9874 475 Sansome St., Suite 510
14	Las Vegas, Nevada 89104	San Francisco, CA 94111
15		
16 17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

1	<u>ORDER</u>
2	The Court having reviewed the foregoing STIPULATION AND ORDER TO
3	EXTEND THE TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS'
4	COUNTERCLAIM in the above-entitled matter and for good cause appearing therefor,
5	IT IS SO ORDERED that the Response to the Defendants' Counterclaim and Demand
7	for Jury Trial will be due on August 1, 2019.
8	
9	
10	
11	7-16-2019
12	Dated:
13	Can Back
14	UNITED STATES MAGISTRATE JUDGE
15	
16	Respectfully submitted by:
17	HKM Employment Attorneys LLP
18 19	/s/ Genny S. Foley
20	Jenny L. Foley, Ph.D., Esq. Nevada Bar No. 9017
21	1785 East Sahara Ave, Suite 300
22	Las Vegas, Nevada 89104 Attorney for Plaintiff
23	
24	
25	
26	
27	
28	